

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

WILLIAM JOSEPH WEBB, JR.,

Plaintiff,

V.

C. A. No. 07-31 – GMS

FIRST CORRECTIONAL MEDICAL,
CORRECTIONAL MEDICAL SERVICES,
GOVERNOR RUTH ANN MINNER,
COMMISSIONER STANLEY W. TAYLOR,
BUREAU CHIEF PAUL W. HOWARD,
MS. GINA WOLKEN,
DR. ALI, DR. NIAZ, DR. JOHN DOE,
DR. JANE DOE, CORRECTIONAL MEDICAL
SERVICES GRIEVANCE HEARING STAFF,
MS. ROSALIE VARGAS,
JOHN DOE, AND JANE DOE,

TRIAL BY JURY OF TWELVE
DEMANDED

Defendants.

**CORRECTIONAL MEDICAL SERVICES' SUPPLEMENTAL RESPONSES TO
PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS
{RELATED DOCKET 69}**

Pursuant to Fed. R. Civ. Pro. 26(e) the following is Defendant, Correctional Medical Services, Inc.'s, supplement to the request for production indicated below.

1. That Defendant produce and permit Plaintiff to inspect and to copy each of the following documents: (a) Plaintiff's complete medical file.

RESPONSE: See attached. It was recently discovered that there may have been in inadvertent error in including all of Plaintiff's Medical Records in the Sealed Documents previously submitted to the Plaintiff and the Court in (DI 69). In order to correct any inadvertent error, attached hereto is a complete copy of Plaintiff's medical records through February 23, 2008.

Marks, O'Neill, O'Brien & Courtney, P.C.

By: /s/Eileen M. Ford

Eileen M. Ford/ID No. 2870

Megan T. Mantzavinos, Esquire/ID No. 3802

913 North Market Street, #800

Wilmington, DE 19801

(302) 658-6538

Attorneys for Defendants

DATED: March 10, 2008

SEALED DOCUMENT
(Plaintiff's Medical Records)

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

WILLIAM JOSEPH WEBB, JR., :

Plaintiff, :

v. :

C. A. No. 07-31 - GMS

FIRST CORRECTIONAL MEDICAL, :
CORRECTIONAL MEDICAL SERVICES, :
GOVERNOR RUTH ANN MINNER, :
COMMISSIONER STANLEY W. :
TAYLOR, BUREAU CHIEF PAUL W. :
HOWARD, MS. GINA WOLKEN, :
DR. ALI, DR. NIAZ, DR. JOHN DOE, :
DR. JANE DOE, CORRECTIONAL :
MEDICAL SERVICES GRIEVANCE :
HEARING STAFF, MS. ROSALIE :
VARGAS, JOHN DOE, AND JANE DOE, :

Defendants. :

CERTIFICATE OF SERVICE

I, Eileen M. Ford, Esquire hereby certify that on this **10th** day of **March**, 2008, I electronically filed the attached **Correctional Medical Services' Supplemental Responses to Plaintiff's Request for Production of Documents** with the Clerk of Court using CM/ECF which will send notification of such filing(s) to the following, Catherine Damavandi, Esquire. I have served via first class mail two copies of the **Correctional Medical Services' Supplemental Responses to Plaintiff's Request for Production of Documents** to the Pro Se Plaintiff:

William Joseph Webb, Jr., pro se
SBI # 256056
Delaware Correctional Center
1181 Paddock Road
Smyrna, DE 19977

/s/ Eileen M. Ford
Megan T. Mantzavinos, Esquire (ID No. 3802)
Eileen M. Ford, Esquire (ID No. 2870)
Marks, O'Neill, O'Brien & Courtney, P.C.
913 Market Street, #800
Wilmington, DE 19801
(302) 658-6538
Attorney for Defendants Correctional Medical
Services

Date: March 10, 2008